

UNITED STATES DISTRICT COURT

for the

Southern District of Texas

MAY 10 2017

Clerk of Court

United States of America)

v.)

Jose Alfredo GUAJARDO USCZ 1993)

Case No. M-17-0832-M

Saul BULOS-Gonzalez MxCZ 1981)

Juan Jose DOMINGUEZ-HERNANDEZ MxCZ 1988)

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 05-09-2017 in the county of Hidalgo in the
Southern District of Texas, the defendant(s) violated:

Code Section

Title 21 USC 841(a)(1), 846

Offense Description

Knowingly and Intentionally Posses w/ Intent to Distribute a Controlled Substance to wit: Approximately 3.8 kilograms of cocaine, a Schedule II Controlled Substance

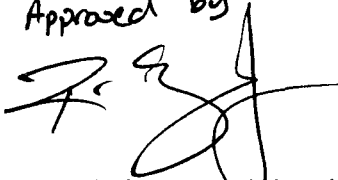
Knowingly and Intentionally Conspire to Posses w/ Intent to Distribute a Controlled Substance to wit: Approximately 3.8 kilograms of cocaine, a Schedule II Controlled Substance.

This criminal complaint is based on these facts:

SEE ATTACHMENT "A"

☒ Continued on the attached sheet.

Approved by



Sworn to before me and signed in my presence.

Date:

5/10/17

City and state:

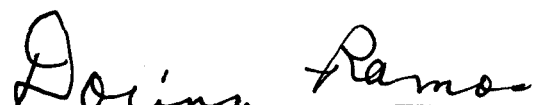
McAllen, Texas



Complainant's signature

DEA Task Force Officer David Ponce

Printed name and title



Judge's signature

U.S. Magistrate Judge Dorina Ramos

Printed name and title

ATTACHMENT A

On 05-09-17, McAllen D.O. Agents obtained information from a documented Cooperating Source indicating a load of cocaine was being stored at a residence in rural Edinburg, TX. The CS provided detailed information pin pointing a residence located at 6406 Lorena, Edinburg, TX. Agents established surveillance at the residence, and at approximately 10:30am, Agents observed a white Ford Focus arrive at the target residence. The driver, later identified as Juan Jose DOMINGUEZ-Hernandez, made contact with the occupants of the residence and went inside. DOMINGUEZ-Hernandez exited the residence at approximately 10:45am with the occupant of the residence later identified as Jose Alfredo GUAJARDO. GUAJARDO and DOMINGUEZ-Hernandez traveled to a drive-thru store and ordered food. While at the drive-thru store, GUAJARDO was observed signaling a blue Chevrolet Silverado truck driven by a male subject later identified as Saul BULOS-GONZALEZ. BULOS-Gonzalez traveled to the target residence and parked outside. GUAJARDO and DOMINGUEZ-Hernandez then departed the drive-thru and were pulled over by a marked Edinburg PD unit for a traffic violation. The officer made contact with GUAJARDO and DOMINGUEZ-Hernandez and asked them if they would travel back to the target residence. GUAJARDO and DOMINGUEZ-Hernandez agreed and Agents escorted them back to the target residence. Prior to arriving at the residence, BULOS-GONZALEZ departed when he observed the police unit. BULOS-Gonzalez was pulled over by a marked Edinburg PD unit and escorted back to the target residence. Agents then approached the target residence and made contact with home owner Cristal LOPEZ who signed a written consent to search for the residence. Agents searched the residence and located three kilograms of cocaine in plain view in a box in the master bedroom. Agents continued the search the residence and located six baggies containing chunks of cocaine that appeared to have been cut from a kilogram. Additionally, Agents located cutting agents and baggies utilized to re-package narcotics. Agents seized the suspected cocaine and later processed it and found it test positive for cocaine and weighed 3.8 kilograms.

Agents later interviewed LOPEZ, GUAJARDO, BULOS-Gonzalez and DOMINGUEZ-Hernandez. BULOS-Gonzalez stated he was with GUAJARDO at the target residence the night before drinking. BULOS-Gonzalez stated he left early in the morning and was returning to clean up the mess they left behind. BULOS-Gonzalez stated he did not have knowledge of narcotics at the target residence. DOMINGUEZ-Hernandez stated he arrived at the target residence to do construction work and did not know there were narcotics inside the house. Agents then interviewed LOPEZ who stated GUAJARDO was her live-in boyfriend. LOPEZ stated GUAJARDO, BULOS-Gonzalez and DOMINGUEZ-Hernandez were at her residence the night before cutting a kilogram of cocaine. LOPEZ state the three bundles of cocaine belonged to her boyfriend GUAJARDO. Agents interviewed GUAJARDO who claimed ownership of the cocaine at the residence. GUAJARDO stated he accepted custody of the 3 kilograms cocaine the previous day and stored them at the residence to be repackaged. GUAJARDO stated he, DOMINGUEZ-Hernandez and BULOS-GONZALEZ repackaged the 3 kilograms that evening in preparation to be sent to Atlanta, Georgia. After obtaining consent to search on one of the cell phones seized by Agents, a picture showing all three defendants cutting into a kilogram of cocaine was saved on the device at 7:20pm 9:43pm the previous evening.

Agents then placed GUAJARDO, BULOS-Gonzalez and DOMINGUEZ-Hernandez under arrest for Possession of a Controlled Substance and housed in jail overnight until being remanded to the custody of the US Marshal's the following day. LOPEZ was released pending further investigation.